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10 Attorney for Defendant
11 JOSE MANUEL ONTIVEROS VERDUGO

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE EASTERN DISTRICT OF CALIFORNIA

14
15 UNITED STATES OF AMERICA,) Case No: 2:23-CR-0162-DAD
16 Plaintiff,)
17)
18 vs.) STIPULATION AND ORDER TO CONTINUE
19) STATUS CONFERENCE AND EXCLUDE
20 JORGE OMAR ARREDONDO-GARCIA, et) TIME
21 al.,)
22 Defendant.) District Judge Dale A. Drozd
23) New Date: December 17, 2024
24) Time: 9:30 a.m.
25)

26 IT IS HEREBY STIPULATED and requested by and between the parties through their
27 respective counsel, ADRIAN KINSELLA, Assistant United States Attorney, attorney for the
28 GOVERNMENT; PATRICK McCARTHY, attorney for Defendant JORGE OMAR
ARREDONDO-GARCIA; DINA SANTOS, attorney for Defendant GREGORIO
ONTIVEROS VERDUGO; RACHELLE BARBOUR, attorney for Defendant JOSE MANUEL
ONTIVEROS VERDUGO; MARK REICHEL, attorney for Defendant ALBERTO NAVARRO
ZAPATA; and MICHAEL LONG, attorney for Defendant WILFREDO F. REYES, that the
status conference currently set for Tuesday, September 24, 2024, be continued to Tuesday,
December 17, 2024 at 9:30 a.m., and that time be excluded for preparation of counsel.

29 There is a protective order in this multi-defendant case. (Doc. 69.) The Government first
30 produced discovery consisting of approximately 700 pages of Bates-stamped documents and
31 over 73.9 gigabytes of native files, including cell phone databases and other items for defense
32 review. The Government then produced over 1400 pages of additional protected discovery. A

third production of approximately 2000 pages and files of protected discovery was received in March. The discovery includes dozens of audio files from wiretaps and many surveillance videos.

Since the start of the case, Defense counsel have been reviewing and analyzing the above, conducting legal research, meeting with their clients, and otherwise preparing for trial. The above tasks are ongoing, and the defense requires additional time to review discovery, discuss the case with their clients and the Government, and continue to prepare. The parties believe that failure to grant the requested continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

Accordingly, the parties stipulate and request that the Court exclude time between the date of the filing of this stipulation through the new status conference date of December 17, 2024 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

Date: September 18, 2024

/s/ Patrick McCarthy
PATRICK McCARTHY
Attorney for Defendant
JORGE OMAR ARREDONDO-GARCIA

/s/ Dina Santos
DINA SANTOS
Attorneys for Defendant
GREGORIO ONTIVEROS VERDUGO

HEATHER E. WILLIAMS
Federal Defender

/s/ Rachelle Barbour
RACHELLE BARBOUR
Attorney for Defendant
JOSE MANUEL ONTIVEROS VERDUGO

/s/ Mark Reichel
MARK REICHEL

1 Attorney for Defendant
2 ALBERTO NAVARRO ZAPATA
3
4

5 /s/ Michael Long
6 MICHAEL LONG
7 Attorney for Defendant
8 WILFREDO F. REYES
9

10 DATED: September 18, 2024
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12

13 PHILLIP A. TALBERT
14 United States Attorney
15

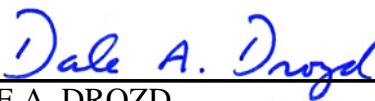
16 /s/ Adrian Kinsella
17 ADRIAN KINSELLA
18 Assistant U.S. Attorney
19 Attorney for the United States
20

21 O R D E R
22

23 Pursuant to the stipulation of the parties and good cause appearing, the status conference
24 scheduled for September 24, 2024 is continued to December 17, 2024 at 9:30 a.m. and time is
25 excluded under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).
26

27 IT IS SO ORDERED.
28

Dated: September 18, 2024


DALE A. DROZD
UNITED STATES DISTRICT JUDGE